

Considering Organic Certification

By Jake Schmitz
Organic Program Coordinator
Kentucky Department of Agriculture

Motivations

Organic farming is an environmentally responsible approach to producing high-quality food and fiber. Personal health and environmental concerns have long been motivating factors for those who choose to farm organically. Increasingly, however, economics has become a major factor. Organic farmers typically earn a premium for their production, and though it is not true for all products, many organic commodity crops have lower costs of production than do the same conventional crops.

Commitments

Farming organically involves committing to two principles: *ecological production* and *maintaining organic integrity*. *Ecological production* entails using farming and ranching techniques and materials that conserve and build the soil resource, pollute little, and encourage development of a healthy diverse agroecosystem, which supports natural pest management. *Maintaining organic integrity* consists of actions that prevent contamination of organic production with prohibited materials, and that prevent the accidental mixing (commingling) of organic and conventional products. A considerable amount of paperwork and documentation is required to ensure organic integrity; it is one of the necessary "burdens" of being a certified organic farmer.

Prospective organic producers should understand in advance that prohibited substances (synthetic fertilizers and pesticides, etc.) must not have been used on the land for three full years preceding harvest of the first organic crop. Farms or specific fields that do not yet meet this requirement may be considered as in *transition*, though this term does not have legal status at this time.

Organic livestock producers must make a further commitment—to manage and raise their livestock in ways that are not cruel and that take account of the animals' natural behavior. This includes providing pasture for ruminants and outdoor access for all livestock, and agreeing to restrictions on physical alterations.

Steps To Organic Certification (More information about KDA's organic program is available at www.kyagr.com and then click on "Organic Program" on the drop down menu.)

1) Submit an application

The producer should request a copy of KDA's organic standards and an application packet, which includes an organic farm plan questionnaire. Upon submission of this application, an application fee is required. The producer must complete the questionnaire, which elicits information about the farm, including details about soil fertility planning, seeds and seedlings, weed and pest management practices (including the materials one plans to use), and storage and handling routines. Farm maps will be required along with

crop and input histories for all fields. Strategies to prevent contamination with prohibited substances and commingling with non-organic products must be outlined. The farm plan questionnaire will also elicit information on the producer's plans to monitor the farm operation to insure compliance.

2) Completeness review

KDA reviews the organic farm plan application to be certain that it is complete and that the operation appears able to comply with National Organic Program (NOP) organic standards. The producer will be contacted to provide further information if needed.

3) On-farm inspection

If the organic farm plan application is judged to be complete, KDA assigns an organic inspector to inspect all relevant areas of the farm. The inspector looks for all indications that the producer is operating according to their organic plan and is in compliance with organic standards. An inspection affidavit is completed during the inspection and signed by the producer and the inspector. The inspector reviews with the producer all identified non-compliance issues at the end of the inspection. Finally, the inspector submits a detailed report to the certifier on all findings. (Note that inspectors only record observations; they do not make decisions about certification.)

4) Final review

The organic farm plan application and inspection report is reviewed by KDA. There can be several outcomes of the review: Approval for organic certification; Request for additional information; Notification of noncompliance; Denial of certification.

If certification is granted, the producer can begin marketing his or her products as organic. The producer is free to use the seal of KDA's Organic Program and also the USDA's organic seal.

Notification of noncompliance implies that the applicant will be granted certification if certain things are changed. A producer does have the option of rebutting a charge of noncompliance. He or she also has the option of making application through another certification agent. However, since all certifiers must recognize the same federal standards, any clear violation of standards will need to be rectified. Noncompliance issues often involve inadequate records of such things as manure applications, equipment cleaning on farms where conventional production is also done, and compost preparation.

At this time, producers may not use "organic," "transitional," "transition to organic," or any similar terminology to describe and market production from fields or farms in *transition*. This issue is under consideration by the National Organic Program and some legal form of transitional status may be recognized in the future.

The \$5,000 Exemption

Producers who market less than \$5,000 worth of organic products annually are not required to become certified, though they have the option of doing so. **They do,**

however, have to register with KDA and pay the \$25 registration fee. These operations must still adhere to the federal standards for organic production, product labeling, and handling. Exempted operations face two other constraints. While they may label their products as organic, they may not use the USDA seal, the seal of KDA's Organic Program, or otherwise claim that their production is certified. Furthermore, they may not sell their products as ingredients for use in someone else's certified organic product. Retail stores may require exempted producers to sign an affidavit stating that they adhere to federal organic standards.

Financial Assistance With Certification Costs

The 2002 farm bill has set aside monies for a national organic certification cost-share program to help producers and handlers of organic products obtain certification. The bill allows a maximum federal cost share of 75% of the cost of certification, with a maximum payment of \$500 made to a producer or handler under this provision.

The National Organic Certification Cost Share Program is funded at \$5 million over the 6-year life of the farm bill.

Producers should contact KDA's Organic Program by calling Jake Schmitz at (502) 564-4983 for details on how to apply for this assistance.